



1776 K STREET NW
WASHINGTON, DC 20006
PHONE 202.719.7000

www.wileyrein.com

August 3, 2016

Jan Witold Baran
202.719.7330
jbaran@wileyrein.com

BY EMAIL (JJORDAN@FEC.GOV, DRAWLS@FEC.GOV)

Federal Election Commission
Office of Complaints Examination and Legal Administration
Attn: Donna Rawls, Paralegal
999 E Street, NW
Washington, DC 20463

Re: MUR 7105

Dear Mr. Jordan:

This office represents the American Action Network. Enclosed please find an executed Statement of Designation of Counsel form.

On July 25, 2016, the American Action Network received your letter and accompanying complaint alleging a violation of the Federal Election Campaign Act of 1971, as amended (the "Act"). Due to summer vacation schedules, our office will need more than the 15-day allotted time to confer with our client, investigate the allegations in the complaint, and to compile an appropriate response. Therefore, we respectfully request a 30-day extension – until September 8, 2016 – to file a response.

Your letter is also directed to Caleb Crosby, in his official capacity as Treasurer of the American Action Network. Please note that Mr. Crosby is not the Treasurer of the American Action Network and the complaint's assertion to the contrary is incorrect. Regardless, as a matter of law, only the Treasurer of a *political committee* can be personally named and liable for a reporting violation like that alleged in the complaint. See 52 U.S.C. 30104(a). The American Action Network is not a political committee.¹ Therefore, we respectfully request your confirmation that Mr. Crosby is not a respondent in this matter.

Similar to the allegation against Mr. Crosby, the complaint alleges a violation by Senator Norm Coleman, "in his official capacity as Chairman" of the American

¹ See, e.g., FEC Form Schedule 5-E, Itemized Independent Expenditures, American Action Network, (June 4, 2016), available at: <http://docquery.fec.gov/pdf/486/201606049017470486/201606049017470486.pdf#navpanes=0> (cited in footnote 5 of the complaint as the basis for its allegation, but titled "Report of Independent Expenditures Made and Contributions Received; To be Used by Persons (Other than Political Committees)" (emphasis added)).

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Mr. Jeff S. Jordan
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Action Network. The Act does not contemplate any such liability for an individual, and Senator Coleman has not received notice of the complaint. We respectfully request your confirmation that, like Mr. Crosby, Senator Coleman is not a respondent in this matter.

We would very much appreciate your favorable consideration of these requests.

Sincerely,

A handwritten signature in black ink, appearing to read "Ian Baran", written in a cursive style.

Ian Witold Baran
Caleb P. Burns

Enclosure

170744-140719



FEDERAL ELECTION COMMISSION
999 E Street, NW
Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL
Please use *one* form for each Respondent/Entity/Treasurer
FAX (202) 219-3923

MUR # 7105

NAME OF COUNSEL: Jan Witold Baran, Caleb P. Burns

FIRM: Wiley Rein LLP

ADDRESS: 1776 K Street NW

Washington, DC 20006

TELEPHONE- OFFICE (202) 719-7000

FAX (202) 719-7049 Web Address www.wileyrein.com

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

8/2/16
Date

[Signature]
Respondent/Agent - Signature

President
Title (Treasurer/Candidate/Owner)

RESPONDENT: American Action Network
(Committee Name, Company Name, or Individual Named in Notification Letter)

MAILING ADDRESS: _____
(Please Print)

TELEPHONE- HOME (____) _____

BUSINESS (____) _____

Information is being sought as part of an investigation being conducted by the Federal Election Commission and the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation